REMARKS/ARGUMENT

Claims 1-40 have been cancelled and new claims 41 to 49 have been added. Claims 41 to 43 are directed to the method, claims 44 to 46 are directed to a computer program and claims 47 to 49 are directed to the system. As will be evident the number of claims has been drastically reduced from 40 to 9 in an effort to advance the prosecution of the application and obtain an early allowance.

INVENTION

The new claims express the inventive aspect in more detail and clarity. Referring initially to the method claims 41 to 43, the method includes the steps of

a. providing a container delimited by an initial set of container grid lines;

b. providing a set of graphical objects, each graphical object of the set of graphical objects having a set of object grid lines for one of delimiting the graphical object and aligning with important graphical features of the object;

c. selecting the graphical objects of the set of graphical objects one-by-one;

d. placing each selected one graphical object within the container;

e. for an object grid line of the placed selected one graphical object that coincides with an initial container grid line, binding the object grid line to the initial container grid line to establish the spatial constraint that the object line and the initial container grid line have the same position;

f. for an object grid line of the placed selected one graphical object that is not coincident with a container grid line, generating an additional container line at the position of the non-coincident object grid line, and binding the non-coincident object grid line to the generated additional container grid line to create an association between the non-coincident object grid line and the generated additional container grid line to establish the spatial constraint that the associated non-coincident object grid line and the associated generated additional container grid line are coincident and have the same position;

g. for any repositioning and resizing of a graphical object that involves changing the position of an object grid line of the graphical object, moving the generated additional container grid line associated with the object grid line to be changed while maintaining

the coincident binding of the generated associated additional container grid line and the associated object grid line in order to change the associated object grid line of the graphical object;

h. correlating the object grid lines of one graphical object to the object grid lines of another graphical object indirectly through the intermediary of the bound initial container grid lines and the bound generated additional container grid lines;

i. storing in an hierarchical data structure the binding of the object grid lines of each graphical object and any associated bound initial container grid lines and associated bound generated additional container grid lines; and

j. applying a constraint resolution for automatic layout of the graphical objects to the stored hierarchical data structure and for automatically repositioning and resizing graphical objects based on the binding of the initial container grid lines and the generated additional container grid lines associated with the object grid lines of the graphical object to be moved.

Key limitations of claim 41 to 43 include steps f, g, h, I, and j. The essence of the invention is not only are the object grid lines bound with the generated additional container grid lines, but also (i) that the resizing or changing of position is accomplished by moving the generated additional container grid lines, (ii) that the correlation of the object grid lines in the several graphical objects is by reference to the generated additional container grid lines, (iii) that the storing of the hierarchical data structure is based on the binding of the initial container grid lines and the generated additional grid lines associated with the object grid lines of the graphical objects, and (iv) that the application of the constraint resolver is based on the binding of the initial container grid lines and the generated additional container grid lines associated with the object grid lines of the graphical object to be moved. None of these aspects of the present invention as recited in the new claims can be found in the prior art. The foregoing applies with equal vigor respecting the computer program claims 44 to 46 and the system claims 47 to 49.

REJECTION

Referring now to the cited and applied art, claims 1-40 are rejected under 35 U.S.C.

103(a) as being unpatentable over <u>Lynn et al.</u> (US 6,993,709) in view of <u>Farrah</u> (US 2004/0030997) and further in view of <u>Balthaser</u> (US 7,000,180).

It was contended in the action that <u>Lynn</u> discloses a method for entering a presentation into a computer, comprising:

a.   providing a container having a set of container grid lines (Fig 5A);

b.   providing a set of graphical objects, each graphical object of the set of graphical objects having a set of object grid lines (Fig 5A, '24);

c.   selecting one of the graphical objects of the set of graphical objects (column 7, lines 33-45);

d.   positioning of the selected one of the graphical objects within the container (column 7, lines 33-45);

e. if one object grid line of the set of object grid lines of the one of the graphical objects is positioned on one of the container grid lines: binding of the one object grid line to the one container grid line (Figure 5C).

Lynn discloses positioning attaching a selected object to attraction points on a grid. The surrounding box 42 is bound with the container grid line through the location of the attraction points.

<u>Farrah</u> discloses a similar system for creating an artwork that further discloses if one object grid line is not positioned on a container grid line: generating additional container grid lines at the current position of the one object grid line and binding the object into a region in the container (page 10, paragraph 233). However, <u>Farrah</u> does not explicitly disclose the additional grid lines are movable. <u>Balthaser</u> discloses similar methods, systems, and processes for entering a presentation into a computer that further discloses generating horizontal and vertical "guides" (additional container grid lines) that are movable and may be snapped to grid lines and objects. Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made that additional movable grid lines could be generated to bind the graphic object in <u>Lynn</u> to a container region. One would have been motivated to generate additional movable grid lines in order to freely place a graphic object in any space on the container.

Claims 2, 9, and 16: <u>Lynn, Farrah,</u> and <u>Balthaser</u> disclose a method for entering a presentation into a computer as in Claims 1, 8, and 15 above, and <u>Farrah</u> further discloses that the additional container grid lines are generated and bound when the

selected one of the graphical objects is located within the container (page 10, paragraph 233). Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made to generate additional container grid lines and bind the graphic object in <u>Lynn</u> when the object is positioned within the container. One would have been motivated to generate additional grid lines when the object is placed in the container in order to provide the user with the freedom to place a graphic object in any space on the container. As in Claims 1, 8, and 15, the property that the additional container grid lines are movable is incorporated from Balthaser, and so forth regarding others of claims 1 to 40.

DISTINCTION

The new claims express the inventive concept in more detail and with more particularity. The essence of the invention as now claimed has been put forth above. Whereas the prior art applied, as noted above, does show the features that the Examiner has noted, it is respectfully pointed out that the tertiary reference, Balthauser, only discloses the movablilty of grid lines with reference to his definition of a "grid"

> Grid—A grid may comprise a series of horizontal and vertical lines that are evenly spaced. The distance between two horizontal lines or two vertical lines in the grid may be controlled by user input.

see column 17, line 33. What is significant is that the distance between grid lines is controllable by the user, whereas in the present invention, the generated additional grid line are bound to the object grid lines and not movable per se by the user.

The secondary reference, Farrah, does show one additional grid line bound to one of the object grid lines. However, Farrah does not show all of the object grid lines bound to generated additional container grid lines, as is claimed by the present invention. The primary reference, Lynn does show providing container grid lines, providing graphical objects with object grid lines and positioning an object in the grid, and if one of the object lines is positioned on a container grid line to bind it to it. However, the primary reference does not show binding all the object lines to generated additional container grid lines as required by the limitations of the present invention.

Moreover, according to the limitations of the present invention, as claimed, the initial container grid lines only serve to delimit the container, and therefore give reference to its perimeter. When an object is placed in the container, then additional container grid lines are generated and bound to all of the objects grid lines. This limitation of the invention is not shown in the references or taught by them singly or in combination. Further, the claim limitations of relating objects, resizing and changing position, storing hierarchical data respecting the objects and constraint resolution are all performed according to the limitations of the invention by reference to the generated additional container grid lines, and not by direct reference to the object grid lines. This aspect is entirely novel and not disclosed or taught, or even hinted at by the cited and applied prior art. For these reasons, and others, the present invention as now claimed patentably distinguishes over the cited and applied art of record and the claims should be allowable.

In light of the foregoing amendments and remarks, this application is now in condition for allowance, and early action is respectfully solicited. If any questions remain regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned. No fee is believed due. However, please charge any other required fee (or credit overpayments) to the Deposit Account of the undersigned, Account No. 500601 (Docket No. 7390-X04-029).

Respectfully submitted,

/Martin Fleit/

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